

To: Federal Communication Commission  
From: Randy Wright, KZWV-FM, Eldon, Missouri  
Re: Localism Comments

Please accept the following comments as they relate to the Report and Notice of Proposed Rulemaking on broadcast localism. My name is Randy Wright and I am the General Partner of a limited partnership that is the licensee of a single small-market FM station serving an unrated area of central Missouri.

To say the FCC's proposed rulemaking on localism has me concerned would be a gross understatement. Upon purchasing the license for a class A FM licensed to Eldon, Missouri at FCC auction two years ago, I entered broadcast station ownership as a "new entrant" and did so with an understanding of what the rules and expectations would be as a broadcast station owner. Having paid the FCC for the unbuilt FM station license this investment and understanding of the rules represented the basis on which I built and launched the radio station. Now, with this proposed rulemaking on "localism" I notice numerous potential rules which will greatly impact our ability to provide service to the communities we serve and run 180 degrees to the rules I was told would be in place when I bid for, won and paid a substantial amount of money for the license.

In addition and most importantly, there is absolutely no need for this proceeding and my small radio station is a key example of why:

Community Advisory Boards/Public Service Commitment: our six full-time employees are dedicated members of the community and already serve on numerous city, county and civic boards and do this not because it's mandated but because it's good business and our people believe in doing what's right for our service area. With that in mind we devote hours of airtime each month to public causes and have a specific program set up to highlight numerous local civic causes devoting local public service announcement production and airtime in an ongoing fashion. Our radio station only airs locally-oriented community service campaigns and devotes a minimum of one minute per hour of airtime to these civic programs. In addition,

one of our six full-time employees is a news and community service director who is devoted 100% to gathering community information, engaging civic leaders and highlighting needs in the region for our radio station to highlight and address. We routinely address issues of various community groups and “underserved” audiences and are proud of the work we do. Our radio station, only 18 months old, has already won public service awards from the Missouri Broadcasters Association and any regulation that increases our expenses elsewhere, i.e. forcing 24 hour staffing, will undoubtedly impact our financial ability to afford this full-time news and community service director and our minimum of one-minute per hour devoted to nothing but local community service announcements. Adding unnecessary regulation in this regard will without doubt negatively impact localism and I urge you not to enact any initiative in this area.

Remote Station Operation: we carefully program our radio station to continue providing local news, weather forecasts, severe weather updates, etc. even during hours when the station is not physically manned. Technology now makes it possible to provide the best in community service and emergency information without being on site and our station currently employs the latest EAS warning system which instantly breaks into our programming anytime day or night with the latest emergency information. And during times of extreme emergencies our staff has a 24/7/365 on call schedule which has been used on several circumstances to ensure the best possible access for listeners to receive information. Should the localism proceeding move forward and require 24/7/365 manning of radio stations our station will be forced to leave the air during overnights because of the inability to attract qualified personnel and beyond that the subsequent expense associated with such additional manpower. By forcing many radio stations off the air during nighttime and weekends the FCC will cause great harm to localism and especially in small markets and rural areas across America. Nothing could do more to harm broadcasting and communities they serve than to move ahead with such a misguided ruling!

Main Studio Rule: Returning to the old ruling regarding the

location of the main studio is not only unnecessary it's unfair considering the substantial investment our station and thousands of others have made in building out permanent studios and facilities within the rules and guidelines provided by the FCC for years! We routinely engage our community of license as well as many others in our coverage area and our facility is located well within the FCC guidelines. Forcing us to rebuild a studio in our community of license would be a total waste of financial resources that we currently invest in greater community service and programming. Again, if the FCC forces a return to these outdated and unnecessary rules the impact, especially in unrated and rural areas like ours, will be the exact opposite of creating more localism.

Voice-Tracking: Please allow me to address the topic of voice-tracking because our station utilizes it for a portion of our broadcast day and I personally program a four-hour shift via the method each day. Used appropriately voice-tracking allows radio stations to enhance localism and community service. I voice track the 3pm-7 pm time-period Monday through Friday and a five-hour program on Saturday evenings from 7 pm-12 midnight. The technology that allows voice-tracking provides me with the flexibility to provide a high quality local program without constraining my schedule for four hours each day. I typically voice track my segments the day of airing, voicing six or seven segments each hour with three to four featuring local information including news, weather, sports and civic events. With such a small staff we're able to maximize our time in the community through the use of voice tracking and there's nothing wrong with using the technology to enhance our ability to serve our region. Limiting or regulation of any type of voice tracking will serve to diminish localism because, especially in small and rural markets like ours, radio stations can't afford the staffing necessary to maintain live local announcers at all hours. Again, additional regulation will serve to diminish localism because broadcasters will be forced to engage satellite programming (less localism!) or just air music programming without any announcing at all (less localism!).

I know the localism proceeding may sound like a good idea on the surface in Washington D.C. but out here in the real world, in small

market America where we're fighting for our financial viability while paying off substantial debt that was brought about through the purchase of a FCC license at auction, it's a proposed rulemaking that's downright bad policy and should be rejected in full. Broadcasters have never had more competition and media has never been more fragmented meaning we're fighting for our lives while already facing more regulation than all our competitors combined! Broadcasters now compete with satellite radio, the vastness of the internet, i-pods and other forms of recorded digital music, etc. and each of those mediums enjoy virtually limitless freedom from regulation. Broadcasters contribute directly to our communities and dedicate hours and hours to civic causes, news, weather and emergency information and the key to our success lies in localism. We're the only government regulated media that is truly local and we're doing an amazing job of servicing our communities with no guarantee of success. My company has invested more than \$1.5 million in our small market radio station based on the rules, guidelines and expectations we had from the FCC in 2006. It's not only unwise and unnecessary to further constrain our efforts through any of the proposed rulemaking, it would be extremely unfair. I urge you to totally reject this proceeding and protect the great work being done by America's broadcasters.

Randy Wright